

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AMANDA STALLARD, *et al.*

v.

FIFTH THIRD BANK, *et al.*

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2:12-cv-01092-MRH

MOTION FOR THE *PRO HAC VICE*
ADMISSION OF ATTORNEY RACHEL AGHASSI

Plaintiffs Amanda Stallard and Tamika Strong, on behalf of themselves and others similarly situated and by and through their undersigned attorney Mark J. Gottesfeld, respectfully move for the *pro hac vice* admission of Attorney **Rachel Aghassi**. Attorney Aghassi's *pro hac vice* admission should be permitted, pursuant to Local Civil Rule 83.2.B, for the reasons described below:

1. Attorney Gottesfeld, who serves as Attorney Aghassi's sponsor, is licensed to practice in the Commonwealth of Pennsylvania (PA Bar No. 307752) and is a member in good standing of this Court. Attorney Gottesfeld knows Attorney Aghassi to be an attorney of high character, competence, and integrity.

2. Attorney Aghassi maintains an office at Two International Drive, Suite 350, Rye Brook, New York 10573. Her office telephone number is 914-934-9200; her office fax number is (914) 934-9220; and her email is rachel.aghassi@klafterolsen.com. Ms. Aghassi is a member in good standing of the following courts:

New York (state) – 2011
Eastern District of New York (federal) – 2012
Southern District of New York (federal) – 2012

3. Attorney Aghassi has never been the subject of any disciplinary action in any jurisdiction and has never been denied admission to any court.

4. As indicated by the accompanying declaration, Attorney Aghassi is a registered user of this Court's ECF system and has read and understands this Court's Local Rules.

WHEREFORE, Plaintiffs respectfully request that the Court admit Attorney Aghassi *pro hac vice*. A proposed order is attached.

Dated: February 11, 2014

/s/ Mark J. Gottesfeld
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R. Andrew. Santillo, Esq.
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